



FEDERAL ELECTION COMMISSION
Washington, DC 20463

JUL 27 2011

Christopher DeLacy, Esq.
Holland & Knight
2099 Pennsylvania Avenue, N.W., Suite 100
Washington, D.C. 20006

RE: MUR 6054
Sarasota 500, LLC d/b/a
Sarasota Ford

Dear Mr. DeLacy:

On August 26, 2008, the Federal Election Commission notified Sarasota 500, LLC d/b/a Sarasota Ford of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended.

On June 28, 2011, after an investigation of the allegations in the complaint, the Commission voted to dismiss the allegations as they pertain to Sarasota 500, LLC d/b/a Sarasota Ford. The Factual and Legal Analysis, which more fully explains the Commission's decision, is enclosed for your information.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Jack Gould or Michael Columbu at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Allen".

Mark Allen
Assistant General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

In the matter of)
)
) MUR 6054
)
Sarasota 500, LLC d/b/a Sarasota Ford)

I. GENERATION OF MATTER

This matter was generated by a complaint filed with the Federal Election Commission ("the Commission") by Citizens for Responsibility and Ethics in Washington, Melanie Sloan, David J. Padilla, and Carlo A. Bell. *See* 2 U.S.C. § 437g(a)(1).

II. INTRODUCTION

This matter concerns campaign contributions received by Vern Buchanan for Congress ("VBFC") during the 2006 and 2008 election cycles that were reimbursed with the funds of car dealerships in which Representative Vernon Buchanan ("Buchanan") holds, or previously held, a majority ownership interest.

III. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his or her name to be used to effect such a contribution. 2 U.S.C. § 441f. The MUR 6054 Complaint alleged that campaign contributions were reimbursed at Sarasota 500, LLC d/b/a Sarasota Ford, a car dealership in which Buchanan holds, or previously held, a majority ownership interest.

Although there is evidence that employees of Sarasota Ford were offered cash reimbursements for their contributions, the Commission has not obtained evidence that Sarasota 500, LLC d/b/a Sarasota Ford reimbursed any of its employees' contributions.

1 IV. CONCLUSION

2 Accordingly, the Commission dismissed the allegation that Sarasota 500, LLC d/b/a
3 Sarasota Ford violated 2 U.S.C. § 441f. *See Heckler v. Chaney*, 470 U.S. 821 (1985).

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